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November 3, 1998

F. Andrew Turley, Esquire
Supervisory Attorney
Central Enforcement Docket
Federal Election Commission
Washington, DC 20463

Re: Israel and Sari Roizman - Matter MUR 4821

Dear Mr. Turley:

I am writing on behalf of my clients Israel and Sari Roizman in response to your letter of October 21, 1998 concerning allegations that they may have violated the Federal Election Campaign Act of 1971 (the "Act"). In this regard, I have enclosed two Statement of Designation of Counsel forms signed by Mr. & Mrs. Roizman indicating that I represent them in this matter.

The Roizman's, as husband and wife, contributed a total of \$4,000 to Lazio for Congress on January 31, 1997. The contribution was made by check, and drawn on the joint account of Mr. & Mrs. Roizman. A copy of the check is attached hereto as Exhibit A. Pursuant to 11 C.F.R. § 110.1(i)(1), campaign contribution limitations "apply separately to contributions made by each spouse" Accordingly, both Mr. & Mrs. Roizman are entitled to contribute up to \$1,000 to any election for federal office. See 11 C.F.R. § 110.1(b)(1).

The contribution check at issue clearly indicates that \$2,000 was contributed towards the primary election and \$2,000 towards the general election, as required by 11 C.F.R. § 110.1(b)(4)(i). Thus, Mr. & Mrs. Roizman contributed \$1,000 each for the primary and general elections, for a total of \$4,000, as permitted by 11 C.F.R. § 110.1 et seq.

F. Andrew Turley, Esquire

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In making this contribution, the Roizman's followed the instructions provided by the Lazio for Congress committee upon receiving an invitation to a February 6, 1997 breakfast that they were unable to attend. See Exhibit B. These instructions paraphrase the Federal Election Rules as set forth in 11 C.F.R. §110.1 et seq.

Based upon the foregoing explanation, I do not believe Mr. & Mrs. Roizman have violated the Act as alleged. Please feel free to contact me if I can provide you with any additional information that may resolve this matter.

Very truly yours,

James J. Eisenhower (cc)
James J. Eisenhower, III

JJE/MKT

cc: Jennifer H. Boyt

(A)



ISRAEL ROIZMAN - \$2000 - PRIMARY - 10/10
SARI ROIZMAN - \$2000 - 6/24/2001
6 MEMOSA CIRCLE
LAFAYETTE HILL, PA 19444

4353

Date 1/31/97

Pay to the order of LAZIO FOR CONGRESS

\$ 2000

Full Thousand

Dollars

JEFFERSON
BANK

1807 WALNUT ST., PHILADELPHIA, PA 19103

memo

[Signature] Sari Roizman

B

RESPONSE FORM

Yes, I will attend the February 6, 1997, Breakfast.

Enclosed is my personal check for _____ tickets at \$500 each.

 X No, I cannot attend, but enclosed is my contribution of \$ 4,000.00

Name: Israel Roizman

Employer or PAC: Roizman Development, Inc.

Address: 919 E. Germantown Pike, Suite 5

City: Norristown State: PA Zip: 19401

Federal law requires political committees to report the name, address, occupation and name of employer for each individual whose contributions aggregate in excess of \$200 in a calendar year.

Please make checks payable to "Lazio for Congress" and if you are unable to attend mail along with this completed form to:

Lazio for Congress
Attn.: Alan Hirnes
Related Capital Company
625 Madison Avenue
New York, NY 10022
(212) 421-5333 extension 2290

The maximum Contribution for an individual is \$2,000 which must be designated on the memorandum section of the check as \$1,000 for primary and \$1,000 for general election; and \$4,000 for a husband and wife if drawn on a joint account (with the check or memorandum signed by both husband and wife) and designation on the memorandum section of the check as \$2,000 for primary and \$2,000 for general election.

CORPORATE CONTRIBUTIONS ARE NOT PERMITTED BY FEDERAL LAW.

POLITICAL CONTRIBUTIONS ARE NOT DEDUCTIBLE AS CHARITABLE CONTRIBUTIONS FOR FEDERAL INCOME TAX PURPOSES.

STATEMENT OF DESIGNATION OF COUNSEL

MUR 4821

NAME OF COUNSEL: JAMES EISENHOWER

FIRM: MONTGOMERY McCracken WALKER + RHODS

ADDRESS: 123 SOUTH BROAD ST
PHILADELPHIA, PA 19109

TELEPHONE: (215) 772-7308

FAX: (215) 772-7620

The above-named individual is hereby designated as my counsel
and is authorized to receive any notifications and other communications
from the Commission and to act on my behalf before the Commission.

Date

Signature

RESPONDENT'S NAME: SARI ROIZMAN

ADDRESS: 6 MIMOSA CIRCLE
LAFAYETTE HILL, PA 19344

TELEPHONE: HOME()

BUSINESS()

STATEMENT OF DESIGNATION OF COUNSEL

MUR 4821

NAME OF COUNSEL: JAMES COHEN/HOUSE

FIRM: MONTGOMERY McCracken Walker + Rhoads

ADDRESS: 123 SOUTH BROAD ST
PHILADELPHIA, PA 19109

TELEPHONE: (215) 772-7308

FAX: (215) 772-7620

The above-named individual is hereby designated as my counsel
and is authorized to receive any notifications and other communications
from the Commission and to act on my behalf before the Commission.

Date



Signature

RESPONDENT'S NAME: ISRAEL ROIZMAN

ADDRESS: 6 MINNA CIRCLE
LAFAYETTE HILL, PA 19344

TELEPHONE: HOME()

BUSINESS()